

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

JOHN E. WHITE, #148157

Full name and prison number
of plaintiff(s)

V.

LIEUTENANT FINLEY, Super-

intendent of County Jail,

and NURSE BAILEY

Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

2007 OCT 23 P 2:43

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

CIVIL ACTION NO. 2:07-cv-951-MEF
(To be supplied by the clerk
of U.S. District Court)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES() NO(X)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES() NO(X)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) N/A

Defendant(s) N/A

2. Court (if federal court, name the district; if state court, name the county)

N/A

3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition(for example: Was the case dismissed?
Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT St. Clair Correctional Facility
St. Clair County, Springville, Alabama

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Montgomery
County Jail

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR
CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	Lieutenant Finley,	Montgomery County Jail, Montgomery, Alabama
2.	Nurse Bailey,	Montgomery County Jail, Montgomery, Alabama
3.		
4.		
5.		
6.		

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED May 4, 2007
and May 25, 2007

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION
THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: (See Additional Page)

Additional Pages:

GROUND ONE: Plaintiff's right to be free from cruel and unusual punishment.

SUPPORTING FACTS: On or about May 4, 2007, at the Montgomery County Jail, the Plaintiff was confined by Lieutenant Finley for 30 days' incarceration in a "strip cell" on suicide watch. Plaintiff's "strip cell" was entirely devoid of furnishings, without light and ventilation, caked with excrement, his cell was not equipped with a toilet which could be flushed by him from within his cell, he was denied clothing, bedding, mattress, soap, towel, toilet paper and reading materials. In addition, Lieutenant Finley refusal to allow the Plaintiff to shower for twenty-one (21) days. Because the Plaintiff had to sleep, lay and sit on the cold floor without a mattress, he suffer from hemmohriod; and because the Plaintiff did not have a shower for twenty-one (21) days, due to filth, his entirely genitals area had broken out with sores as a result. Moreover, after the Plaintiff was final allowed to take a shower beyond the twenty-one (21) days incarceration in a "strip cell" on suicide watch, he was burly assault by a trusty when he was taken out of his cell in handcuff by county jailer, in which the Plaintiff suffer from pain and bleeding of his genitals area by the act of the trusty in grabing and ripping Plaintiff's genital area.

Additional Pages:

GROUND TWO: Plaintiff was denied of medical attention.

SUPPORTING FACTS: On or about May 25, 2007, at the Montgomery County Jail, the Plaintiff was denied medical attention by Nurse Bailey from the injuries he suffer from the burly assault by the trusty when he was taken out of his cell in handcuff by county jailer and was sprayed with mace along with the trusty in the process, and the mace stayed in his eyes without medical attention. Also, Nurse Bailey sended a message by a fellow inmate to tell me to "DIE." However, the trusty was given medical attention and the Plaintiff was denied medical attention.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

(See Additional Page)

GROUND TWO: (See Additional Pages)

SUPPORTING FACTS: (See Additional Pages)

GROUND THREE: N/A

SUPPORTING FACTS: N/A

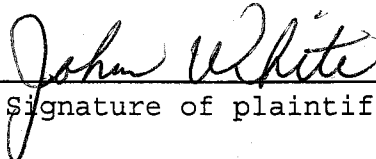
VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Plaintiff seeks damages and injunctive relief against

Lieutenant Finley, the Superintendent of the County Jail,

and Nurse Bailey, and any other relief this court deems

just.

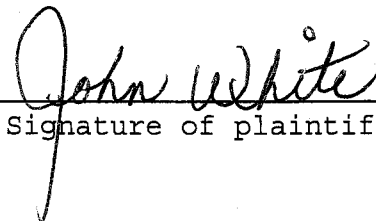


Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on October 19, 2007

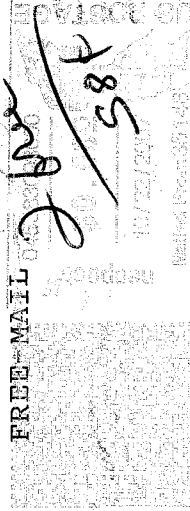
(Date)



Signature of plaintiff(s)

John White
AIS #148157, A-14
St. Clair Correctional Facility
1000 St. Clair Road
Springville, AL 35146-5582

This correspondence is forwarded from an Alabama State Prison. The contents have not been evaluated, and the Alabama Department of Corrections is not responsible for the substance or content of the enclosed communication.



Debra P. Hackett
Clerk, U.S. District Court
15 Lee Street, Ste 206
Montgomery, AL 36104

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